| 1 2 | Teresa M. Corbin (SBN 132360) Denise M. De Mory (SBN 168076) Ethan B. Andelman (SBN 209101) | |
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| 3 | Jaclyn C. Fink (SBN 217913) HOWREY LLP | |
| 4 | Suit I full of the state of the | |
| 5 | Telephone: (415) 848-4900 Facsimile: (415) 848-4999 | |
| 6 7 | Attorneys for Plaintiff SYNOPSYS and Defendants AEROFLEX INCORPORATED, | |
| 8 | AEROFLEX COLORADO SPRINGS, INC., AMI SEMICONDUCTOR, INC., MATROX ELECTRONIC SYSTEMS, LTD., MATROX | |
| 9 | GRAPHICS INC., MATROX INTERNATIONAL CORP., and MATROX | |
| 10 | TECH, INC. | |
| 11 | UNITED STATES DISTRICT COURT | |
| 12 | NORTHERN DISTRICT OF CALIFORNIA | |
| 13 | SAN FRANCISCO DIVISION | |
| 14 | | |
| 15 | RICOH COMPANY, LTD., | Case No. C03-4669 MJJ (EMC) |
| 16 | Plaintiff, | Case No. C03-2289 MJJ (EMC) |
| 17 | vs. | PLAINTIFF SYNOPSYS AND CUSTOMER DEFENDANTS' NOTICE OF ERRATA TO |
| 18 | AEROFLEX INCORPORATED, AMI SEMICONDUCTOR, INC., MATROX | MOTIONS FOR SUMMARY JUDGMENT FILED WITH THE COURT ON AUGUST |
| 19 | ELECTRONIC SYSTEMS LTD., MATROX GRAPHICS INC., MATROX | 18, 2006 |
| 20 21 | INTERNATIONAL CORP., MATROX TECH, INC., AND AEROFLEX COLORADO SPRINGS, INC., | |
| 22 | Defendants. | |
| 23 | SYNOPSYS, INC., | |
| 24 | Plaintiff, | |
| 25 | vs. | |
| 26 | RICOH COMPANY, LTD., | |
| 27 | Defendant. | |
| 28 HOWREY LLP | | |
| HOWNET LEF | Case No. C03-4669 MJJ (EMC)/C03-2289 MJJ (EMC) NOTICE OF ERRATA TO MOTIONS FOR SUMMARY JUDGMENT FILED ON AUGUST 18, 2006 DM_US\8379369.v1 | |

| 1 | Plaintiff Synopsys, Inc. and Defendants Aeroflex Incorporated, Aeroflex Colorado Springs, |
|--|---|
| 2 | Inc., AMI Semiconductor, Inc., Matrox Electronic Systems Ltd., Matrox Graphics Inc., Matrox |
| 3 | International Corp., and Matrox Tech, Inc. (collectively, "Synopsys and the Customer Defendants") |
| 4 | submit this Errata to the Motions for Summary Judgment, filed August 18, 2006. |
| 5 | Errata re Notice of Motion and Motion for Summary Judgment of Non-Infringement (RTL) |
| 6 | [Summary Judgment Motion No. 1] |
| 7 | At page 3, line 19, second column, the text currently reads: "Ex. 9 at 12:9-12." The correct |
| 8 | text should read: "Ex. 8 at 12:9-12." |
| 9 | At page 3, line 23, second column, the text currently reads: "Ex. 9 at 12:5-7." The correct text |
| 10 | should read: "Ex. 8 at 12:5-7." |
| 11 | At page 7, lines 23-24, the text currently reads: "Shir-Shen Chang Dep. At 54:1-3." The |
| 12 | correct text should read: "Ex. 89 (Shir-Shen Chang) at 54:1-3." |
| 13 | At page 7, line 25, the text currently reads: Karen Pieper Dep. At 14:22-23." The correct text |
| 14 | should read: "Ex. 90 (Karen Pieper) at 14:22-23." |
| | |
| 15 | Errata re Notice of Motion and Motion for Summary Judgment of Non-Infringement (Hardware |
| | Errata re Notice of Motion and Motion for Summary Judgment of Non-Infringement (Hardware Cells [Summary Judgment Motion No. 2] |
| 15 | |
| 15 16 | Cells [Summary Judgment Motion No. 2] |
| 15 16 17 | Cells [Summary Judgment Motion No. 2] At page 10, line 10, the text currently reads: "Soderman Rebuttal Report at 8." The correct |
| 15 16 17 18 | Cells [Summary Judgment Motion No. 2] At page 10, line 10, the text currently reads: "Soderman Rebuttal Report at 8." The correct text should read: "Ex. 91 at 8." |
| 15 16 17 18 19 | Cells [Summary Judgment Motion No. 2] At page 10, line 10, the text currently reads: "Soderman Rebuttal Report at 8." The correct text should read: "Ex. 91 at 8." At page 16, line 2, the text currently reads: "['432 patent, col. 16:14-17:10]." The text should |
| 15 16 17 18 19 20 | Cells [Summary Judgment Motion No. 2] At page 10, line 10, the text currently reads: "Soderman Rebuttal Report at 8." The correct text should read: "Ex. 91 at 8." At page 16, line 2, the text currently reads: "['432 patent, col. 16:14-17:10]." The text should read: "Ex. 1 at col. 16:14-17:10." |
| 15 16 17 18 19 20 21 | Cells [Summary Judgment Motion No. 2] At page 10, line 10, the text currently reads: "Soderman Rebuttal Report at 8." The correct text should read: "Ex. 91 at 8." At page 16, line 2, the text currently reads: "['432 patent, col. 16:14-17:10]." The text should read: "Ex. 1 at col. 16:14-17:10." Errata re Notice of Motion and Motion for Summary Judgment of Invalidity of U.S. Patent No. |
| 15 16 17 18 19 20 21 22 | Cells [Summary Judgment Motion No. 2] At page 10, line 10, the text currently reads: "Soderman Rebuttal Report at 8." The correct text should read: "Ex. 91 at 8." At page 16, line 2, the text currently reads: "['432 patent, col. 16:14-17:10]." The text should read: "Ex. 1 at col. 16:14-17:10." Errata re Notice of Motion and Motion for Summary Judgment of Invalidity of U.S. Patent No. 4,922,432 For Violation of 35 U.S.C. § 102(f), Or, In the Alternative, To Dismiss For Failure to |
| 15 16 17 18 19 20 21 22 23 | Cells [Summary Judgment Motion No. 2] At page 10, line 10, the text currently reads: "Soderman Rebuttal Report at 8." The correct text should read: "Ex. 91 at 8." At page 16, line 2, the text currently reads: "['432 patent, col. 16:14-17:10]." The text should read: "Ex. 1 at col. 16:14-17:10." Errata re Notice of Motion and Motion for Summary Judgment of Invalidity of U.S. Patent No. 4,922,432 For Violation of 35 U.S.C. § 102(f), Or, In the Alternative, To Dismiss For Failure to Join All Co-Owners as Plaintiffs [Dispositive Motion No. 3] |
| 15 16 17 18 19 20 21 22 23 24 | Cells [Summary Judgment Motion No. 2] At page 10, line 10, the text currently reads: "Soderman Rebuttal Report at 8." The correct text should read: "Ex. 91 at 8." At page 16, line 2, the text currently reads: "['432 patent, col. 16:14-17:10]." The text should read: "Ex. 1 at col. 16:14-17:10." Errata re Notice of Motion and Motion for Summary Judgment of Invalidity of U.S. Patent No. 4,922,432 For Violation of 35 U.S.C. § 102(f), Or, In the Alternative, To Dismiss For Failure to Join All Co-Owners as Plaintiffs [Dispositive Motion No. 3] At page 2, line 17, the text currently reads: "[Foo 5:25-6:25]." The corrected text should read |
| 15 16 17 18 19 20 21 22 23 24 25 | Cells [Summary Judgment Motion No. 2] At page 10, line 10, the text currently reads: "Soderman Rebuttal Report at 8." The correct text should read: "Ex. 91 at 8." At page 16, line 2, the text currently reads: "['432 patent, col. 16:14-17:10]." The text should read: "Ex. 1 at col. 16:14-17:10." Errata re Notice of Motion and Motion for Summary Judgment of Invalidity of U.S. Patent No. 4,922,432 For Violation of 35 U.S.C. § 102(f), Or, In the Alternative, To Dismiss For Failure to Join All Co-Owners as Plaintiffs [Dispositive Motion No. 3] At page 2, line 17, the text currently reads: "[Foo 5:25-6:25]." The corrected text should read "Ex. 23 (Foo) at 5:25-6:25." |
| 15 16 17 18 19 20 21 22 23 24 25 26 | Cells [Summary Judgment Motion No. 2] At page 10, line 10, the text currently reads: "Soderman Rebuttal Report at 8." The correct text should read: "Ex. 91 at 8." At page 16, line 2, the text currently reads: "['432 patent, col. 16:14-17:10]." The text should read: "Ex. 1 at col. 16:14-17:10." Errata re Notice of Motion and Motion for Summary Judgment of Invalidity of U.S. Patent No. 4,922,432 For Violation of 35 U.S.C. § 102(f), Or, In the Alternative, To Dismiss For Failure to Join All Co-Owners as Plaintiffs [Dispositive Motion No. 3] At page 2, line 17, the text currently reads: "[Foo 5:25-6:25]." The corrected text should read "Ex. 23 (Foo) at 5:25-6:25." At page 3, line 16, the text currently reads: "[Foo Ex. 521; SC3406 (confirming Dr. Foo's |

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| 1 | At page 7, between lines 17 and 18, the text currently reads: "'432 patent at 9:24-34." The |
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| 2 | corrected text should read: "Ex. 1 at 9:24-34." |
| 3 | At page 8, line 11, the text currently reads: "[Foo Ex. 521.]" The corrected text should read: |
| 4 | "Ex. 26." |
| 5 | Errata re Notice of Motion and Motion for Summary Judgment of Invalidity of Claims 13-17 of |
| 6 | U.S. Patent No. 4,922,432 [Dispositive Motion No. 4] |
| 7 | At page 5, line 28, the text currently reads: "[1st Reexam Request.]" The corrected text should |
| 8 | read: "Ex. 38." |
| 9 | At page 8, fn. 5, the text currently reads: "Claim Construction Order at 10." The corrected text |
| 10 | should read: "Ex. 8 at 20." |
| 11 | Errata re Notice of Motion and Motion for Summary Judgment of Unenforceability Due to |
| 12 | Inequitable Conduct [Summary Judgment Motion No. 5] |
| 13 | At page 8, line 18, the text currently reads: "Ex. 40 at RCL000228." The corrected text should |
| 14 | read: "Ex. 46 at RCL000228." |
| 15 | At page 9, line 17, the text currently reads: "Id. at RCL000197." The corrected text should |
| 16 | read: "Ex. 48 at RCL000197." |
| 17 | Errata re Defendants' Motion for Summary Judgment Regarding the Scope of Patent Damages |
| 18 | for Alleged Infringement of U.S. Patent No. 4,922,432 [Summary Judgment Motion No. 7] |
| 19 | At page 4, line 16, the text currently reads: "See Olson Decl., ¶ 7." The corrected text should |
| 20 | read: "See Ex. 58 at ¶ 7." |
| 21 | At page 4, lines 18-19, the text currently reads: "('Heynes Decl."), ¶ 4". The corrected text |
| 22 | should read: "Ex. 59 at ¶ 4". |
| 23 | At page 4, line 21, the text currently reads: "See Heynes Decl., ¶¶ 5 and 6." The corrected text |
| 24 | should read: "See Ex. 59 at ¶¶ 5 and 6." |
| 25 | At page 4, line 22, the text currently reads: "See Heynes Decl., ¶¶ 12-14." The corrected text |
| 26 | should read: "Ex. 59 at ¶¶ 12-14." |
| 27 | |
| 20 | |

| 1 | Errata re Notice of Motion and Motion for Summary Judgment of Non-Willfulness [Summary | |
|---------------|---|--|
| 2 | Judgment No. 9] | |
| 3 | At page 1, lines 16 and 17, the text currently reads, "See Amended Complaint at ¶¶ 20, 26, 32 | |
| 4 | 28, 44, 50, and 56." The corrected text should read: "See Ex. 82 at ¶¶ 20, 26, 32, 28, 44, 50, and 56." | |
| 5 | Dated: August 21, 2006 Respectfully submitted, | |
| 6 | HOWREY LLP | |
| 7 | | |
| 8 | By:/s/Denise M. De Mory | |
| 9 | Denise M. De Mory Attorneys for Plaintiff | |
| 10 | SYNOPSYS, INC. and for Defendants AEROFLEX INCORPORATED, | |
| 11 | AEROFLEX COLORADO SPRINGS, INC., AMI SEMICONDUCTOR, INC., | |
| 12 | MATROX ELECTRONIC SYSTEMS, LTD., MATROX GRAPHICS, INC., | |
| 13 | MATROX INTERNATIONAL CORP., and MATROX TECH, INC. | |
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